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 05/19/2008 12:28 PM

To Christopher Lichens/R9/USEPA/US@EPA
 cc <GENE.LUCERO@lw.com>, "Ed Modiano"
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 <WallinSL@cdm.com>, "Eisenbeis, John"
 bcc
 Subject Revised 5/19 Version of FS Report

History:  This message has been replied to and forwarded.

Chris - per our phone call with you, Fred, and Steve today, I've revised my e-mail from Friday to reflect today's agreements. New or newly excised text is in blue.

Please let us know if you concur with all the changes.

Thanks

Dave

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If, after system optimization, the post-rebound VOC concentrations remain above the site-specific **residential** PRGs (as defined in the HHRA) for soil gas **in the upper 30 feet**, ~~as defined in Table D-3.1- in the HHRA~~, or above cleanup levels that protect groundwater in the lower 30 feet, then enhancements to the SVE system, potentially including hot air injection and/or DPE, would be implemented.

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The results of the HHRA indicated that PCE was the ~~only~~ VOC ~~for which chemical-specific ARARs would have to be considered because it contributed to the~~ **posed the** majority of the **potential** health risk.

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If, after system optimization, the post-rebound VOC concentrations remain above the site-specific **residential** PRGs (as defined in the HHRA) for soil gas **in the upper 30 feet**, ~~as defined in Table D-3.1- in the HHRA~~, or above cleanup levels that protect groundwater in the lower 30 feet, then enhancements to the SVE system, potentially including hot air injection and/or DPE, would be implemented.

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For the SVE components of all three alternatives, it has been assumed that the system would be operated until asymptotic total VOC removal rates and site-specific **residential** cleanup goals in ~~Table~~

~~D-3.1~~ of the HHRA ~~have been achieved~~ in the upper 30 feet and cleanup goals that protect groundwater in the lower 30 feet have been achieved.

Pages 3-9 and 3-10

The following preliminary remediation goals ~~for PCE~~ were defined in the HHRA to be the acceptable risk based levels that quantitatively define the RAOs. **For PCE, these goals are as follows:**

- Indoor Air (residential exposure scenario) – 0.33 ug/m³ PCE
- Shallow Soil Gas (residential exposure scenario) - 470 ug/m³
- Soils (residential exposure scenario) – 1.2 mg/kg
- Outdoor air (industrial exposure scenario) - 0.77 ug/m³

Regarding RAOs 1 and 2, the residential PRGs for soil and soil gas will apply to shallow soils (i.e., above 30 feet bgs). ~~and the commercial PRGs for soil and soil gas will apply to deep vadose zone soils (i.e., deeper than 30 feet bgs).~~ The use of residential PRGs ~~will~~ **may** be re-evaluated if zoning of the area that includes OU-1 changes from commercial/residential to just commercial.